

**REMARKS**

Following the entry of this Amendment, Claims 1-23 are pending in the application of which claims 1, 16 and 21 are independent. Claims 1, 16, 21 and 23 have been amended. No claims have been added or cancelled herein. No new matter has been added.

**Claim Rejections Pursuant to 35 U.S.C. §102(b)**

Claims 1-8, 11-12, 16-17 and 21-23 were rejected under 35 U.S.C. §102(b) as being anticipated by Guck (United States Patent Number 5, 848, 415, hereafter “Guck”). For the reasons set forth below, Applicant respectfully traverses the rejections.

**Summary of Claimed Invention**

The claimed invention provides a mobile content framework (MCF) that facilitates abstracting content and behavior from the rendering of content on a requesting device. Content is abstracted in a manner specifically tailored to take into account the limited resources of certain devices such as mobile device. The abstraction process allows the distribution of uniform content to multiple types of requesting devices. Content is generated specifically for each device, both from a display and attribute standpoint and a content navigation standpoint. The MCF includes a generic markup language, referred to as Wireless Abstract XML (hereafter WAX) that is easily extended and can be translated into a variety of different mobile device markup languages. Content is first translated into WAX from the original language of the content provider, or is created in WAX originally, and then converted into a device appropriate language for a requesting mobile device. WAX is designed to enable the content developer to describe content at a more abstract level than that used in individual protocols. The greater level of abstraction enables the subsequent conversion of WAX into the languages used by the requesting mobile devices such as WML, HDML and HTML. Typical markup languages focus on how content is rendered on the device, while WAX focuses on generic but smart objects whose transformation is tailored to specific devices. During this transformation process, the MCF ensures the best type and length of text is used, the best type and size of image is used, and that the content is well suited and customized for the device attributes. The customization

process uses device attribute records stored in databases to choose appropriate content for the requesting device.

#### Summary of Claim Amendments

Applicant has amended independent claims 1, 16 and 21 to indicate that the attribute used to customize the device-specific content includes least one device attribute from the group of a color depth attribute, memory attribute, storage capacity attribute and operating system of the mobile device attribute. Dependent claim 23 has been amended to recite that the attribute is a translation rules attribute.

#### Summary of Guck

Guck discusses the use of a transmission protocol and application format conversion process that may be utilized with an object database. Requests from a client device for a document cause the requested document to be retrieved, and if necessary, converted to a transmission protocol and application format required or requested for the requesting client device. The conversion process uses many different converter objects to perform the required transformations. In the event a single converter for the required transformation cannot be identified, the system of Guck allows multiple converters to be chained together to produce the result as part of multi-stage process.

#### Argument

Guck fails to disclose all of the elements of Applicant's independent claims, claims 1, 16 and 21, and therefore fails to anticipate Applicant's claimed invention.

In response to the Examiner's comments (Response to Arguments, page 3, para. 3) wherein the Examiner noted that features argued by the Applicant were not specifically recited in the independent claims, Applicant has amended the independent claims herein to clarify the scope of the claimed invention. Applicant has amended the independent claims to indicate that the device attribute used to customize the device-specific content includes at least one of **a color depth attribute, memory attribute, storage capacity attribute and operating system of the**

**mobile device attribute.** Neither Guck nor Bickmore disclose, teach or suggest these added claim limitations. Guck discusses **application format** conversion and communication protocol selection and Bickmore has been cited by the Examiner as disclosing document re-authoring capability coupled with document filtering to provide access to documents over a network to devices with limited **communications bandwidth** and **small displays** (see Page 12 Office Action). Both fail to address, and are not directed to, the type of device attributes now recited in Applicant's amended independent claims.

Applicant also wishes to address, and to object to, the Examiner's statement on page 3 of the Office Action (Response to Arguments section) wherein the Examiner alleged that "Applicant acknowledged Guck conversion process is done base upon device attribute" and cited page 11 of Applicant's Remarks section in support. Applicant respectfully suggests that the Examiner must have accidentally misread Applicant's remarks as Applicant argued repeatedly that Guck does **not** convert based upon device attributes as that term is used by Applicant. Contrary to the Examiner's assertion, Applicant stated:

"As will be pointed out in more detail below, there is **no conversion based on device attributes in Guck** and so therefore no inherently disclosed registry of device attributes" (see page 10 continuing onto page 11, 12/18/06 OA Response); "Figure 7 discusses the conversion of content from one application format to another application format and/or the use of a particular communication protocol **but does not disclose the conversion of generic markup language content based on a device attribute**" (see first full paragraph, page 11); "Applicants respectfully assert that the conversion of content from a first non-generic markup language format (text/rtf) into other requested data formats and the use of requested transmission protocols **can not be cited as disclosing the converting of generic markup language content based upon a device attribute**" (see first full paragraph, page 11); "**The conversion in Guck is not based upon a device attribute** such as...." (see first full paragraph, page 11); "The communication protocols and application data formats discussed in Guck **are not the equivalent of the device attributes** claimed by Applicants" (see first full paragraph, page 11); and "**Guck** represents the prior art system which could deliver documents in a proper application format and with the right communication protocol but **did not customize based upon a device attribute**" (see first full paragraph, page 11).

Accordingly, since for at least these reasons Guck fails to disclose all of the limitations found in Applicant's independent claims as amended, Applicant requests the allowance of independent claims 1, 16 and 21 and the claims dependent thereon.

Claim Rejections Pursuant to 35 U.S.C. §103(a)

Claims 9-10, 13-15, and 18-20 were rejected under 35 U.S.C. §103(a) as being unpatentable over Guck in view of Bickmore et al (United States Patent No.: 6,857,102 , hereafter "Bickmore"). For the reasons set forth below, Applicant respectfully traverses the rejections.

Argument

The combination of references cited by the Examiner, Guck in view of Bickmore, fails to teach or suggest all of the limitations found in Applicant's independent claims upon which claims 9-10, 13-15 and 18-20 are dependent. Bickmore discusses a document re-authoring system, but does not disclose, teach or suggest the claim limitations discussed above that are missing from Guck. Accordingly, Applicant requests the allowance of claims 9-10, 13-15, and 18-20.

**CONCLUSION**

In view of the above amendment, Applicant believes the pending application is in condition for allowance.

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Respectfully submitted,

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